

# BRESSLERAMERYROSS

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David J. Libowsky  
Principal

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April 30, 2019

**VIA ECF**

Clerk, United States District Court  
District of New Jersey  
M. L. King Jr. Federal Building & U. S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

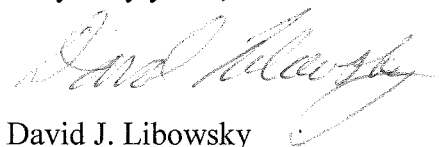
**Re: Potter v. Valeant Pharmaceuticals International, Inc., et al.**  
**Civil Action No. 3:15-cv-07658-MAS-LHG**

Dear Sir/Madam:

Pursuant to Case Management Order No. 1 issued on October 12, 2018 (copy attached), the above-referenced matter is the lead case and the following attorneys from the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP (representing plaintiffs in the BlackRock and Senzar actions) should be added to the service list:

Richard Heimann -	<a href="mailto:rheimann@lchb.com">rheimann@lchb.com</a>
Steven Fineman -	<a href="mailto:sfineman@lchb.com">sfineman@lchb.com</a>
Daniel Chiplock -	<a href="mailto:dchiplock@lchb.com">dchiplock@lchb.com</a>
Bruce Leppla -	<a href="mailto:bleppla@lchb.com">bleppla@lchb.com</a>
Sharon Lee -	<a href="mailto:slee@lchb.com">slee@lchb.com</a>
Michael J. Miarmi -	<a href="mailto:mmiarmi@lchb.com">mmiarmi@lchb.com</a>

Very truly yours,



David J. Libowsky

DJL:dfb  
Enclosure

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: VALEANT  
PHARMACEUTICALS  
INTERNATIONAL, INC. SECURITIES  
LITIGATION

Civil Action No. 15-7658

JUDGE MICHAEL A SHIPP  
JUDGE LOIS H. GOODMAN

**CASE MANAGEMENT ORDER NO. 1**

THIS ORDER RELATES TO ALL CASES

**THESE MATTERS** having been brought to the Court's attention by a review of their respective dockets and by a list of related cases provided by counsel for Defendant Valeant Pharmaceuticals International, Inc., attached to this Order as Exhibit A, it appearing that 30 individual suits have been filed in this Court involving similar issues of law and alleged facts; it also appearing that coordination for pretrial and discovery purposes would promote efficiency and judicial economy; the Court having raised this matter during the in-person status conference conducted on September 26, 2018; Counsel having indicated that they have no objection to coordinating these matters; and for good cause shown

**IT IS** on this 12<sup>th</sup> day of **October, 2018**,

**ORDERED** that the civil actions listed on Exhibit A are coordinated for pretrial purposes. Any actions later filed in this Court that are identified as related matters will automatically be coordinated with this action without the necessity of future motions or orders. This coordination, however, does not constitute a determination that the actions should be consolidated for trial, nor does it have the effect of making any entity a party to any action in which he, she, or it has not been named, served or added in accordance with the Federal Rules of Civil Procedure; and it is further

**ORDERED** that *Potter v. Valeant*, 15-cv-7658, shall be treated as the "Lead Case" and its docket shall be treated as the "Lead Docket." When a pleading or document is intended to be applicable to all actions, it shall be filed on the Lead Docket and this shall be indicated by the words: "This Document Relates to All Cases." When a pleading or document is intended to apply to fewer than all cases, this Court's docket number for each individual case to which the document number relates shall appear immediately after the words "This Document Relates to." The following is a sample of the pleading style:

**IN RE: VALEANT  
PHARMACEUTICALS  
INTERNATIONAL, INC. SECURITIES  
LITIGATION**

Civil Action No. 15-7658

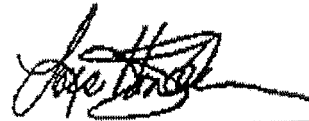
JUDGE MICHAEL A. SHIPP  
JUDGE LOIS H. GOODMAN

THIS DOCUMENT RELATES TO:

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and it is further

**ORDERED** that a service list will be maintained by the Clerk of the Court during the course of this litigation by adding parties and attorneys to the Lead Docket. Existing parties and their counsel will be automatically added for all cases currently pending. Counsel entering an appearance after the docketing of this Order may be added to the service list upon request to the Clerk of the Court and notice to all other persons on the Lead Docket. Likewise, any attorney who wishes to have his/her name removed may do so upon request to the Clerk of Court.



**LOIS H. GOODMAN**  
United States Magistrate Judge

**Exhibit A**

<b><u>Securities Class Action</u></b>	
Robbins Geller Rudman & Dowd LLP  Seeger Weiss LLP	<i>In re Valeant Pharmaceuticals International, Inc. Securities Litigation</i> , No. 15-cv-07658
<b><u>Individual Securities Actions</u></b>	
Bernstein Litowitz Berger & Grossmann LLP  Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C.	<i>T. Rowe Price Growth Stock Fund, Inc., et al. v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 16-cv-05034
	<i>Equity Trustees Limited as Responsible for T. Rowe Price Global Equity Fund, et al. v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 16-cv-06127
	<i>Principal Funds, Inc., et al. v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 16-cv-06128
	<i>BloombergSen Partners Fund LP, et al. v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 16-cv-07212
	<i>Pentwater Equity Opportunities Master Fund LTD v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 3:17-cv-07552
	<i>State Board of Administration of Florida v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 3:17-cv-12808
	<i>The Regents of the University of California v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 3:17-cv-13488
Cohen Milstein Sellers & Toll PLLC	<i>New York City <b>Employees' Retirement System</b>, et. al. v. Valeant Pharmaceuticals International Inc., et. al.</i> , No. 3:18- cv-00032
Critchley, Kinum & Denoia, LLC  Entwistle & Cappuci LLP	<i>Timber Hill LLC, v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 3:18-cv-10246
Dietrich Siben Thorpe LLP	<i>Okumus Opportunistic Value Fund, Ltd. v. Valeant Pharmaceuticals International, et al.</i> , No. 17-cv-6513
Grant & Eisenhoffer P.A.	<i>Första AP-Fonden, et al., v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 3:17-cv-12088
Hung G. Ta, ESQ. PLLC  Skoloff & Wolfe, P.C.	<i>Colonial First State Investments Limited As Responsible Entity for Commonwealth Global Shares Fund 1, et al. v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 3:18-cv-00383

**Exhibit A**

<b>Individual Securities Actions</b>	
Hung G. Ta, ESQ. PLLC  Safirstein Metcalf LLP	<i>Bharat Ahuja, et al. v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 3:18-cv-00846
Labaton Sucharow LLP	<i>Public Employees' Retirement System of Mississippi v. Valeant Pharmaceuticals International Inc., et al.</i> , No. 17-cv-07625
Kasowitz Benson Torres LLP	<i>The Boeing Company Employee Retirement Plans Master Trust and the Boeing Company Employee Savings Plans Master Trust v. Valeant Pharmaceuticals International Inc., et al.</i> , No. 17-cv-07636
	<i>2012 Dynasty UC LLC, et al., v. Valeant Pharmaceuticals International Inc., et al.</i> , No. 18-cv-08595
Labaton Sucharow LLP  Whipple Azzarello, LLC  Kasowitz Benson Torres LLP	<i>Lord Abbett Investment Trust-Lord Abbett Short Duration Income Fund et al. v. Valeant Pharmaceuticals International Inc., et al.</i> , No. 16-cv-06365
Lieff Cabraser Heimann & Bernstein, LLP	<i>Blackrock Global Allocation Fund, Inc., et al. v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 3:18-cv-00343
	<i>Senzar Healthcare Master Fund, LP, et al., v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 3:18-cv-02286
Lowenstein Sandler LLP	<i>Discovery Global Citizens Master Fund, Ltd., et al. v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 16-cv-07321
	<i>MSD Torchlight Partners, L.P., et al. v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 16-cv-07324
	<i>BlueMountain Foinaven Master Fund L.P., et al. v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 16-cv-07328
	<i>Incline Global Master LP, et al. v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 16-cv-07494
	<i>VALIC Company I, et al. v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 16-cv-07496
	<i>Janus Aspen Series, et al. v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 16-cv-07497
	<i>GMO Trust, et al. v. Valeant Pharmaceuticals International, Inc., et al.</i> , 3:18-cv-00089

**Exhibit A**

<b><u>Individual Securities Actions</u></b>	
Lowenstein Sandler LLP (continued)	<i>Brahman Capital Corp., et al., v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 3:18-cv-00893
	<i>The Prudential Insurance Company of America, et al., v. Valeant Pharmaceuticals International, Inc., et al.</i> , No. 3:18-cv-01223
Quinn Emanuel Urquhart & Sullivan, LLP	<i>Hound Partners Offshore Fund, LP, et al., v. Valeant Pharmaceuticals International Inc., et. al.</i> , No. 18-cv-08705